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- 3. The parties agree and stipulate, and request that the Court find the following:
- a) The government has represented that the discovery associated with this case includes reports, photographs, and audio files. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
- b) Counsel for defendant was recently re-appointed in this matter. Counsel for defendant desires additional time to review discovery, conduct any investigation, and discuss this matter, including potential resolutions, with the defendant in order to prepare for trial. Moreover, counsel for the defendant requires additional time to discuss resolution with his client.
- c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 - d) The government does not object to the continuance.
 - e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
 - f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 26, 2025 to September 24, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.
 - g) The parties also agree that this continuance is necessary for several reasons, including but not limited to, the need to permit time for the parties to exchange supplemental discovery, engage in plea negotiations, and for the defense to continue its investigation and preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

| 1 | Respectfully submitted, |
|-----|--------------------------------------------------------------------------------------------|
| 2 | MICHELE BECKWITH |
| 3 | Acting United States Attorney |
| 4 | Dated: June 23, 2025 /s/ David Gappa DAVID GAPPA |
| 5 | Assistant United States Attorney Attorney for Plaintiff |
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| 7 8 | Dated: June 23, 2025 HEATHER E. WILLIAMS Federal Defender |
| 9 | |
| 10 | /s/ Griffin Estes GRIFFIN ESTES |
| 11 | Assistant Federal Defender Attorney for Defendant ANTHONY DALTON WOLFF |
| 12 | ANTHONY DALTON WOLFF |
| 13 | |
| 14 | <u>ORDER</u> |
| 15 | IT IS SO ORDERED that the status conference is continued from June 26, 2025, to |
| 16 | September 24, 2025 at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. |
| 17 | McAuliffe. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and |
| 18 | |
| 19 | (iv). |
| 20 | IT IS SO ORDERED. |
| 21 | Dated: June 23, 2025 /s/ Barbara A. McAuliffe |
| 22 | UNITED STATES MAGISTRATE JUDGE |
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| | Wolff – Stipulation to Continue |

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